

EXHIBIT

A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

KATHY PICARD,

Plaintiff,

v.

LOUIS BUONICONTI,

Defendant.

) **Civil Action No. 3:14-cv-30115-KAR**
)
)
) **FIRST SET OF**
) **INTERROGATORIES IN AID OF**
) **EXECUTION TO LOUIS**
) **BUONICONTI**
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INTRODUCTION

Plaintiff, Kathy Picard, pursuant to Fed. R. Civ. P. 33 and Fed. R. Civ. P. 69, propounds the following interrogatories to you, the Defendant, Louis Buoniconti, to be answered separately and fully in writing under oath. You are required to serve your answers to these interrogatories on the undersigned attorney within thirty (30) days from the day these interrogatories are served upon you. These interrogatories are continuing in nature and require you to supplement answers in accordance with Fed. R. Civ. P. 26(e).

DEFINITIONS

As used in these interrogatories, the definitions set forth in Local Rule 26.5 of the Local Rules for the United States District Court for the District of Massachusetts are incorporated herein by reference, and the additional terms listed below are defined as follows:

A. The terms “you” or “your” mean Defendant, Louis Buoniconti, his employees, agents, representatives, consultants, accountants, attorneys, and any other person or entity acting or purporting to act on his behalf, including any person who served in any such capacity at any time during the relevant time period specified herein.

B. The term “income” means any and all money, earnings, revenue, or payments of any kind that you received in any form, whether in cash or by check, credit or debit card, electronic transfer, or otherwise, including but not limited to wages, salaries, bonuses, commissions, distributions, dividends, interest income, rents, royalties, estate income, trust income, any and all pensions and annuities, any government or non-governmental assistance, and all other compensation or remuneration you received, whether as an employee, partner, member, shareholder, independent contractor, or otherwise, during the relevant time period.

C. The term “asset” means any property or thing of value you owned, claimed, or held any interest in, in whole or in part, including any and all real property, tangible personal property including cash, automobiles, machinery, equipment, boats, precious metals, jewelry, furniture, and fixtures, and intangible personal property including accounts receivable, notes receivable, stocks, bonds, and other securities, retirement accounts, pensions, annuities, copyrights, patents, insurance policies, and trusts and wills for which you may be a beneficiary.

D. The “relevant time period” means the time period from the commencement of this action on June 26, 2014, to the present date.

INSTRUCTIONS

A. In answering these Interrogatories, furnish all information that is available to you, including information in the possession of your attorneys or investigators, and not merely such information known of your own personal knowledge.

B. If you cannot answer these Interrogatories in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

C. If any information requested in these Interrogatories is withheld on the basis of a claim of privilege or work product or trial preparation material, state the privilege or protection claimed for each item of information, and describe the nature of the information withheld in a manner that, without revealing the privileged or protected information, will enable the Plaintiff to assess the applicability of the privilege or protection.

INTERROGATORIES

1. Please state your full name and current address, including apartment number or other identifier, and ZIP code.

2. Please state your present occupation(s) and your occupation(s) during the relevant time period.

3. Please identify the names, address, and telephone number of each person or entity for whom you performed services for or were employed by during the relevant time period, and each person or entity for whom you currently perform services for and/or are employed by and state the amount you were paid such services and/or employment and state the amount you are presently owed for such services and employment.

4. Please identify, in detail, and state the location of all assets, of any kind, that you now own or hold any interest or did during the relevant time period.

5. Please identify the names and addresses, and a description of any business venture in which, either directly or indirectly, you currently own any interest and/or owned during the relevant time period.

6. Please identify the names, addresses, and telephone numbers of all persons who owe money to you and specify amounts owed.

7. Please identify and state the location of each piece of real estate in which you currently own any interest and/or which you owned any interest during the relevant time period, including:

- a. The property's address.
- b. The purchase price.
- c. The current fair market value.
- d. The type of real property.
- e. How the property is currently titled.
- f. How the property was titled when first purchased.
- g. Your interest in the property.
- h. The identity of any third parties who possess or claim to possess an ownership interest in the property.
- i. Any debts, liabilities, liens, or other encumbrances against the property.

8. Identify and describe all vehicles, aircraft, boats, or other water vessels you currently own, hold, or claim an interest in, directly or indirectly, in whole or in part, or did during the relevant time period, including:

- a. The property's current location.
- b. The property's purchase price.
- c. The current fair market value.
- d. The type of property.
- e. How you acquired an ownership interest or claim in the property.
- f. Your current ownership interest or claim in the property.
- g. The identity of any third parties who possess or claim to possess an ownership interest in the property.

h. Any debts, liabilities, liens, or other encumbrances against the property.

9. Please identify the name, address, and telephone number of all banks, brokerage firms, investment firms, or other financial institutions for any account(s) which you currently own, hold, or claim an interest in, in whole or in part, or did during the relevant time period, and identify the name under which each account is titled, the account number, the account type, the account balance from the date of the commencement of this action on June 26, 2014 to present, the identity of any third parties who possess or claim to possess an ownership interest in the account, and any debts, liabilities, liens, or other encumbrances against the account.

10. Please identify whether you have an interest in any Individual Retirement Accounts, Stock Option Plans, pension or profit-sharing plans, or any other savings or retirement plans other than those listed in response to previous interrogatories. If your answer is yes, state the name, address and telephone number of the custodian of all such assets and state the amount of all such assets.

11. Please identify all policies of life insurance or annuities you currently own, hold, are covered by, or claim any type of interest in, directly or indirectly, in whole or in part, or did during the relevant time period, including, the name, address, and telephone number of the insurance company, the policy number, the policy amount, the type of policy, the present cash or surrender value, the amount of accumulated dividends, if any, and the time period covered under the policy.

12. Please identify and describe your income during the relevant time period, including but not limited to:

- a. All sources of income, revenue, or remuneration of any kind, including payments for goods and services, interest income, operating income, commissions, loan repayments, rents, dividends, distributions, payments relating to sales of assets, or any other payment or remuneration you received in connection with the operation of any business.
- b. Income declared on state and federal income tax returns, and all related forms and schedules (including all amended returns, forms, and schedules) filed during or relating to the relevant time period.
- c. Income from paystubs, W-2s, 1099s, and K-1s, including salary, wages, commissions, distributions, or other compensation or remuneration you received, whether as an employee, partner, member, shareholder, independent contractor, or otherwise, during the relevant time period.

13. Please identify any other assets or an interest in assets, either actual or contingent, tangible or intangible, other than those listed in the previous interrogatory requests. Please describe the assets in detail, identify the location of the asset, and state the current fair market value of each such asset.

14. Please state whether you have transferred, disposed of, or otherwise conveyed any of your income or assets, including, but not limited to, real estate, accounts held at financial institutions, or cash, in excess of \$1,000 in a single transaction, in whole or in part, during the relevant time period, to any third party including, but not limited to:

- a. Banks, financial institutions, brokerage firms, and investment firms.
- b. Accountants.
- c. Business partners.
- d. Friends, family members, or associates.
- e. Other individuals, institutions, or entities.

15. If the response to Interrogatory No. 14, above, is in the affirmative, please identify and describe in detail:

- a. The income or assets transferred to any third party.
- b. The name, address, and telephone number of any third-party transferee.
- c. The date of the transfer.
- d. The amount and/or value of the income or asset transferred.

16. Please identify and describe your routine expenses, including but not limited to:

- a. Rental obligations or other fees or payments for your living arrangements.
- b. Outstanding loans and loan payments and/or financing charges.
- c. Mortgage payments.
- d. Other living expenses.
- e. Legal, accounting, and other professional fees.
- f. Other routine debts and expenses that occur on a regular basis.

17. Identify and describe all debts and liabilities you owed or incurred during the relevant time period, including:

- a. The name, address, and telephone number of the creditor.
- b. The amount owed.

- c. When the debt was incurred and for what reason.
- d. Whether all or any portion of the debt is paid.
- e. When all or any portion was paid.
- f. Whether the debt is secured and, if so, how it is secured.
- g. Any remaining balance on all such debts.

18. Identify all legal actions during the relevant time period in which you have been or are a plaintiff, including:

- a. The title of the case.
- b. The name of the court where the action is or was pending.
- c. The docket number of the case.
- d. A description of the case.
- e. The outcome of the case, if applicable (for example, a judgment for money damages for you against the other party).

19. Identify all legal actions during the relevant time period in which you have been or are a defendant, including:

- a. The title of the case.
- b. The name of the court where the action is or was pending.
- c. The docket number of the case.
- d. A description of the case.
- e. The outcome of the case, if applicable (for example, a judgment for money damages against you for the other party).

The Plaintiff,
Kathy Picard
By Her Attorney:

Dated: September 28, 2022

/s/ Kevin C. Maynard
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Certificate of Service

I, Kevin C. Maynard, hereby certify that a true and correct copy of the foregoing document was served upon the Defendant by U.S. mail on September 28, 2022.

/s/ Kevin C. Maynard
Kevin C. Maynard